

NO.

AFFIDAVIT OF PAUL F. JAMES IN
SUPPORT OF REMOVAL TO
FEDERAL COURT

[illegible]

I, Paul F. James, being first duly sworn upon oath, testify as follows:

1. I am the assistant attorney general assigned to represent defendants WASHINGTON STATE DEPARTMENT OF CORRECTIONS; J. WU, M.D.; PATRICK BARNES PA-C; ROBERT MORISS(?) PA-C; NURSE JANE DOE, R.N. (Initials believed to be M.M.); A. HARRIS, R.N.; R. ROE (Last name unknown) R.N.; and JOHN DOE MEDICAL DIRECTOR, in their capacity. I am over the age of 18, competent to testify as to the matters stated herein, and make this declaration based on my personal knowledge.


2. The State of Washington was served with Plaintiff's Complaint in the above-entitled matter on March 28, 2011.

3. This case involves a claim that plaintiff, Kenneth Parker was deprived of his constitutional due process rights pursuant to 42 U.S.C. § 1983 as well as possible related state law claims.

4. Attached to the Notice of Removal to Federal Court, filed herewith, are true and correct copies of the documents filed in the Thurston County Superior Court File No. 11-2-00691-1.

DATED this 13th day of April, 2011.

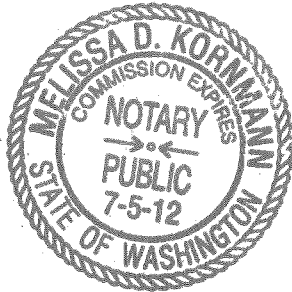
ROBERT M. MCKENNA
Attorney General


PAUL F. JAMES, WSBA No. 13525
Assistant Attorney General
Attorneys for State Defendant

STATE OF WASHINGTON)
) ss.
COUNTY OF THURSTON)

I certify that I know or have satisfactory evidence that Paul F. James is the person who appeared before me, and said person acknowledged that he signed this instrument, on oath stated that he is authorized to execute the instrument and acknowledged it on this 13th day of

1 April, 2011, to be the free and voluntary act of such party for the uses and purposes mentioned
2 in this instrument.



Melissa D. Kornmann
NOTARY PUBLIC in and for the State of
Washington, residing at Olympia, Washington.
My Commission Expires: 7/5/12

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CERTIFICATE OF SERVICE

10 I hereby certify that on this 13th day of April, 2011, I caused to be electronically filed the
11 foregoing document with the Clerk of the Court using the CM/ECF system which will send
12 notification of such filing to the following:

13 Plaintiffs attorney:

14 **Mark Leemon**

15 **leemon@leeroylaw.com**

16 ROBERT M. MCKENNA
17 Attorney General

18
19 /s/ Paul F. James

20 PAUL F. JAMES, WSBA No. 13525
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25 (360) 586-6300
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